

HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,

Plaintiff,

v.

TELECARE MENTAL HEALTH SERVICES
OF WASHINGTON, INC.,

Defendant.

Case No. 21-CV-01339 BJR

**STIPULATED MOTION AND ORDER
TO AMEND SCHEDULING ORDER**

IT IS HEREBY STIPULATED by and between the Plaintiff Equal Employment
Opportunity Commission and Defendant Telecare Mental Health Services of Washington, Inc.
hereto through their respective attorneys of record that:

1. WHEREAS, on May 27, 2022, the Court entered an Order Setting Trial Dates and
Related Dates (Dkt. No. 44), which requires discovery to be completed by January 25, 2023;

2. WHEREAS, on January 10, 2023, the Court extended Plaintiff's discovery cutoff
to March 11, 2023. (Dkt. No. 53). Plaintiff's dispositive motion deadline was also extended to
April 10, 2023, and the Court granted Plaintiff an additional 30 days to respond to any
dispositive motion filed by Defendant (*id.*);

3. WHEREAS, the Parties agree that Defendant's fact discovery deadline is
extended to March 11, 2023 for the purpose of reopening Jason Hautala's deposition to inquire

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1 about matters pertaining to newly acquired discovery, matching the deadline set for Plaintiff in
2 the Court's January 10, 2023 Order (Dkt. No. 53);

3 4. WHEREAS, Defendant's dispositive motion deadline is extended to April 10,
4 2023 to match the deadline for Plaintiff set in the Court's January 10, 2023 Order (Dkt. No. 53);

5 5. WHEREAS, responsive pleadings for both parties' dispositive motions are now
6 due pursuant to the schedule set forth in the Court's Standing Order (Dkt. No. 5);

7 6. WHEREAS, the EEOC will provide amended responses and produce in response
8 to Defendant's Interrogatories 2, 4 and 11 the following documents:

- 9 a. All ESI with metadata that is responsive to Defendant's Interrogatory Nos. 2 and
10 4, including all emails and text messages; and
11 b. Any documents, including ESI with metadata, related to Plaintiff's claim for
12 damages, including for emotional distress, and including such documents that
13 relate to Jason Hautala's job search after Defendant rescinded his conditional job
14 offer.

15 The Parties therefore respectfully request that the Court issue an order in accordance with
16 the Parties' requests above.

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15 ***Attorneys for Defendant TELECARE***

ORDER

Upon review of the foregoing Stipulated Motion of the Parties, the Court ORDERS that:

1. Defendant's fact discovery deadline is extended to March 11, 2023 for the purpose of reopening Jason Hautala's deposition to inquire about matters pertaining to newly acquired discovery after January 24, 2023, matching the deadline set for Plaintiff in the Court's January 10, 2023 Order (Dkt. No. 53);

2. Defendant's dispositive motion deadline is extended to April 10, 2023 to match the deadline for Plaintiff set in the Court's January 10, 2023 Order (Dkt. No. 53);

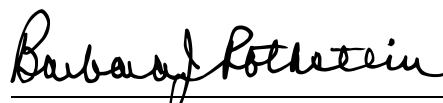
3. Responsive pleadings for both parties' dispositive motions are now due pursuant to the schedule set forth in the Court's Standing Order (Dkt. No. 5);

4. EEOC shall provide amended responses and produce in response to Defendant's Interrogatories 2, 4 and 11 the following documents:

- a. All ESI with metadata that is responsive to Defendant's Interrogatory Nos. 2 and 4, including all emails and text messages; and
- b. Any documents, including ESI with metadata, related to Plaintiff's claim for damages, including for emotional distress, and including such documents that relate to Jason Hautala's job search after Defendant rescinded his conditional job offer.

IT IS SO ORDERED.

DATED this 3rd day of February, 2023.


Barbara Jacobs Rothstein
U.S. District Court Judge